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September 12, 2006

Via HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings

SEP 12 2006

Part of
Public Record



Re: STB Ex Parte No. 646 (Sub No. 1) – Simplified Standards for Rail Rate Cases

Dear Secretary Williams:

Enclosed for filing in the captioned proceeding, please find the original and twenty (20) copies of the Reply of the Association of American Railroads to Various Shippers' Motion for Extension of Time.

Thank you for your assistance in this matter.

Sincerely,

Samuel M. Sipe, Jr.
Counsel for the Association of American
Railroads

**BEFORE THE
SURFACE TRANSPORTATION BOARD**



**Ex Parte No. 646 (Sub-No. 1)
SIMPLIFIED STANDARDS FOR RAIL RATE CASES**

**REPLY OF THE ASSOCIATION OF AMERICAN RAILROADS
TO VARIOUS SHIPPERS'
MOTION FOR EXTENSION OF TIME**

The Association of American Railroads ("AAR") hereby replies to the Motion for Extension of Time filed with the Board in this proceeding by various shipper organizations on September 8, 2006.¹ The Shippers' seek an extension from September 29, 2006 until October 24, 2006 to file opening comments in this proceeding and also seek extensions for Reply and Rebuttal Comments.

AAR is in the process of preparing its Opening Comments and stands ready to file them on September 29, 2006 as called for in the Board's July 26, 2006 Notice of Proposed rulemaking if the Board decides to adhere to its original schedule. However, AAR does not oppose the requested extension. If an extension is granted, AAR requests that the due date for Reply Comments be changed from November 22, 2006 as proposed by the shippers until November 30, 2006. Rebuttal Comments would still be due on December 21, 2006 as proposed by the Shippers.

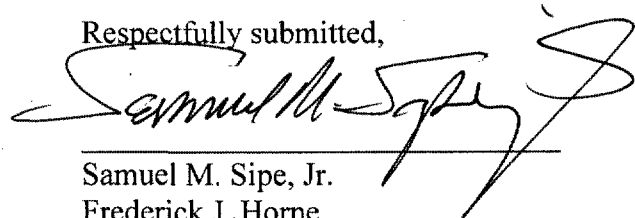
¹ The filing organizations are The National Industrial Transportation League, National Grain and Feed Association, The Fertilizer Institute and American Chemistry Council (collectively referred to as "Shippers").

In AAR's experience, the Reply Comment stage of rulemaking proceedings has been a particularly critical and labor intensive phase, requiring review of comments submitted by all other parties and careful coordination among the multiple members of an organization like AAR. The Shippers' proposed schedule would unduly truncate the period for preparing Reply Comments and would require a filing the day before Thanksgiving, which could interfere with travel plans of counsel, witnesses and clients. Undersigned counsel for AAR has contacted Mr. DiMichael, who filed the Motion for Extension on behalf of the Shippers, to advise him of the proposed change in the due date for Reply Comments and Mr. DiMichael has represented that the Shippers do not oppose AAR's suggestion of extending the new reply date from November 22 to November 30 and leaving the rebuttal on December 21.

Finally, AAR notes that one of the reasons given by the Shippers for the requested extension is that it "will permit experts being retained to obtain needed data from the Board and from other sources. . . ." AAR requests that, in the event that the Board makes data available to the Shippers or other parties in connection with this proceeding, it advise all parties on the service list that such data is being made available and can be obtained on request by other parties that have announced their intention to participate in this proceeding.

Louis P. Warchot
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Respectfully submitted,

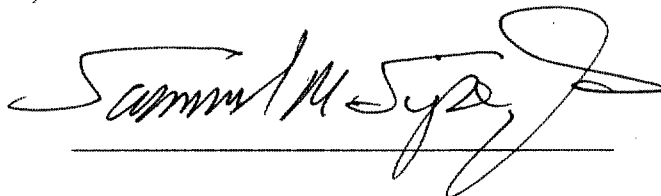


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September 12, 2006

Certificate of Service

I hereby certify that I have, on this 12th day of September 2006, served a copy of the foregoing Reply of the Association of American Railroads to Various Shippers' Motion for Extension of Time on all parties of record, in accordance with the Board's Rules of Practice.



A handwritten signature in black ink, appearing to read "Samuel M. Sykes", is written over a horizontal line. The signature is stylized with a large, looping initial 'S' and a long, sweeping tail.